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Representing the United States of America

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,
Plaintiff,

vs.

LANCE K. BRADFORD,
Defendant.

CASE NO: 2:19-CR-00222-GMN-BNW

**STIPULATION REGARDING THE
LENGTH OF THE JUNE 14, 2022
FRANKS HEARING**

JASON M. FRIERSON, Acting United States Attorney, through STEVEN W. MYHRE, Assistant United States Attorney, and PATRICK BURNS, Trial Attorney, Department of Justice – Tax Division, and RUSSELL MARSH, ESQ., RICHARD A. WRIGHT, ESQ., and GEORGE P. KELESIS, ESQ., counsel for Defendant LANCE K. BRADFORD, submit the following stipulation regarding the length of the June 14, 2022

1 *Franks* Hearing:

2 1. On May 5, 2022, the Court entered an order requiring the parties to submit by
3 May 31, 2022 a stipulation regarding the length of the upcoming June 14, 2022 *Franks*
4 evidentiary hearing. ECF No. 94 at 2:12-14.

5 2. Defendant's position is that the hearing will require two days to complete. The
6 government's position is that the hearing can be completed in one day.

7 3. Defendant and the government have conferred over witnesses and agreed that
8 the government will begin the hearing by presenting testimony from retired FBI Special Agent
9 Michael Elliott, IRS CI Special Agent Jared Robbins, and retired IRS CI Special Agent
10 Charyn Aldred.

11 4. Additional witnesses the defendant intends to call include Michael Holpuch
12 (the declarant for Exhibits 2 and 4 attached to defendant's motion, ECF No. 83), and Brian
13 Atwood or another IT provider for LL Bradford. Defendant might also potentially call himself
14 and/or his wife, Leilani Bradford, as witnesses.

15 5. The government anticipates potentially calling IRS CI Special Agent Elizabeth
16 Lam to briefly testify regarding evidence bearing on defendant's standing to bring a *Franks*
17 suppression motion.

18 6. Defendant anticipates potentially seeking to call one or more rebuttal witnesses
19 during the hearing.

20 Dated this 31st day of May, 2022

21 JASON M. FRIERSON
22 United States Attorney

1
2 By: /s/Russell Marsh, Esq.
3 RUSSELL MARSH, ESQ.
4 Counsel for Defendant BRADFORD

/s/Steven W. Myhre
/s/Patrick Burns
By: STEVEN W. MYHRE
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PATRICK BURNS
Trial Attorney – Tax Division
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6 By: /s/Richard A. Wright, Esq.
7 RICHARD A. WRIGHT, ESQ.
8 Counsel for Defendant BRADFORD

9 By: /s/George P. Kelesis, Esq.
10 GEORGE P. KELESIS, ESQ.
11 Counsel for Defendant BRADFORD

12 **ORDER**

13 IT IS ORDERED that ECF No. 97 is GRANTED to the
14 extent that the Court will set aside June 15, 2022 for the
hearing to continue, if necessary, into a second day.

15 IT IS SO ORDERED

DATED: 4:23 pm, June 01, 2022



16 BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE